

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

In re: _____) Chapter 11
EASTERN LIVESTOCK CO., LLC, et al.¹)
Debtors. _____) Case No. 10-93904-BHL-11
_____) JOINTLY ADMINISTERED

**AGREED MOTION TO EXTEND DEADLINES IN AGREED SCHEDULING ORDER
ON CONTESTED MATTER INVOLVING JOPLIN'S RESERVED OBJECTIONS TO
TRUSTEE'S PURCHASE MONEY CLAIMS REPORT**

James A. Knauer ("Trustee") and Joplin Regional Stockyards ("Joplin" and collectively with the Trustee, the "Parties"), respectfully request that the Court extend certain of the deadlines set forth in the *Agreed Scheduling Order On Contested Matter Involving Joplin's Reserved Objections to Trustee's Purchase Money Claims Report* [Dock. No. 776] (the "Scheduling Order") as requested herein because the Parties believe that the requested extensions will reduce costs and allow the Parties to work towards an informed settlement in light of pending determinations in this chapter 11 case that will affect this contested matter.

This contested matter involves the same or similar issues as currently before the Court pursuant to separate pleadings. Because the Court's decision on those matters will affect the Parties' positions, settlement negotiations and scope of discovery, the Parties respectfully request that the Court enter an order extending certain of the deadlines contained in the Scheduling Order pending the Court's determination of similar issues in separate matters. Specifically, the Parties request that 1) the deadline for the parties to respond to discovery be extended through and including March 2, 2012, 2) the deadline by which depositions shall be completed be extended through and including March 19, 2012, 3) the deadline by which the

¹ The Debtor entities are Eastern Livestock Co., LLC and Okie Farms, L.L.C.

Parties shall file with the Court a stipulation of material facts not in dispute and a notice identifying their suggested fact and legal issues to be decided by the Court be extended through and including April 2, 2012 and 4) the dispositive motion deadline be extended through and including May 4, 2012.

WHEREFORE, the Parties respectfully request that the Court enter an order extending the deadlines contained in the Scheduling Order as requested herein and granting the Parties all other just and proper relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2012, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on February 1, 2012, a copy of the foregoing pleading was served via electronic mail transmission on the following:

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